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MEMO ENDORSED

3/11/08
Matter Adj to 3/28/08
@ 3:30 PM. Time is
Excluded through 3/28/08.

[Handwritten signature]

March 11, 2008

Fax: (212) 805-6326
HON. COLLEEN McMAHON
Attn: Jim O'Neill, Esq.
United States District Court
300 Quarropas Street
White Plains, New York 10601

re: United States v. Russell King
07 Cr 952 (CLB)

Dear Judge McMahon:

Mr. King's case is calendared for a conference on March 14, 2008, at 3:30 p.m. in White Plains. I have had discussions with the government regarding a disposition and, as a result of those discussions, yesterday the government sent me a proposed written plea agreement together with a proposed superceding information. I met with the client today at the Westchester County Jail to review these documents. The government and I had initially planned to have the client produced tomorrow, March 12, for a plea proceeding before a magistrate judge. However, after consulting with my client, I have agreed with the government to calendar the plea proceeding a week later, for March 19. I require this extra time so as to ensure that my client can fully review and understand the agreement and the plea process and so he can inform his family. In view of that, I am requesting that the conference set for March 14, 2008, be adjourned to a date after March 19. The parties agree and the defense consents to exclusion of time for speedy trial purposes until such adjourned date.

Very truly yours,

[Handwritten signature of Theodore S. Green]
THEODORE S. GREEN

cc: AUSA MARCIA COHEN, ESQ.
Fax: (914) 993-1980

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